

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13:

SANDRA DEE MOORE

NO. 24-01334-JAW

**TRUSTEE'S RESPONSE TO AMENDED NOTICE OF MORTGAGE PAYMENT
CHANGE FILED BY U.S. BANK NATIONAL ASSOCIATION C/O NEWREZ
LLC DBA SHELLPOINT MORTGAGE SERVICING**

COMES NOW Trustee, Torri Parker Martin, and files this her Answer to Amended Notice of Mortgage Payment Change filed by U.S. National Association C/O Newrez LLC DBA Shellpoint Mortgage Servicing and in support thereof would respectfully show unto this Honorable Court the following:

1. U.S. National Association C/O Newrez LLC DBA Shellpoint Mortgage Servicing filed a Amended Notice of Mortgage Payment Change on July 11, 2025 effective July 5, 2025 in the amount of \$731.94 (see Court Claims Register).
2. Pursuant to Bankruptcy Rule 3002.1, Creditor should file the Amended Notice of Mortgage Payment change as a supplement to their Proof of Claim at least 21 days before the new payment amount is due.
3. U.S. National Association C/O Newrez LLC DBA Shellpoint Mortgage Servicing failed to file the notice within twenty-one (21) days of the due date.
4. The Trustee objects to U.S. National Association C/O Newrez LLC DBA Shellpoint Mortgage Servicing's noncompliance of Rule 3002.1.

WHEREFORE, PREMISES CONSIDERED, Trustee prays this response be received and filed and upon a hearing hereon, this Honorable Court will enter an Order denying U.S. National Association C/O Newrez LLC DBA Shellpoint Mortgage

Servicing's Amended Notice of Mortgage Payment Change and any general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: July 21, 2025

Respectfully submitted,

/s/ Torri Parker Martin
TORRI PARKER MARTIN
CHAPTER 13 TRUSTEE
200 North Congress St., Ste 400
Jackson, MS 39201
tpm@tpmartinch13.com

CERTIFICATE OF SERVICE

I, Torri Parker Martin, do hereby certify that I have this day electronically filed a true and correct copy of the above and foregoing Objection to Amended Notice of Mortgage Payment Change to the following, all by ECF system: Abigail Marbury, Asst. U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

Thomas Carl Rollins, Jr., Esq.
trollins@therollinsfirm.com

U.S. National Association C/O
Newrez LLC DBA Shellpoint Mortgage Servicing
P.O. Box 10826
Greenville, SC 29603

Robertson Anschutz Schneid Crane & Partners, PLLC
13010 Morris Road, Suite 450
Alpharetta, GA 30004

Sandra Dee Moore
1336 Moore Road
Porterville, MS 39352

Aldridge Pite, LLP
3333 Camino del Rio South
Ste 225
San Diego, CA 92108

DATED: July 21, 2025

/s/ Torri Parker Martin.
Torri Parker Martin